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October 25, 1994

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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OCT 25 1994

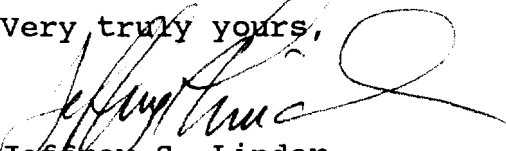
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: Ex Parte Contact in Docket No. 94-1

Dear Mr. Caton:

This is to inform you that Scoop Sairanen, Vice President-Regulatory of TCA, and I met with Dan Grosh, David Nall, and other members of the Common Carrier Bureau staff to discuss matters contained in the attached paper,

Very truly yours,

  
Jeffrey S. Linder

JSL:rw

cc: Dan Grosh  
David Nall

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OCT 25 1994

Tele-Communications Association  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

## **FCC POLICIES CAN PROTECT SERVICE QUALITY**

### **Background**

- The FCC's service quality monitoring program has improved markedly since 1990 -- particularly by recognizing the benefits of "benchmarking"
- TCA's Service Quality Survey shows overall satisfaction with service quality, but also reveals certain danger signs:
  - increases in held orders
  - decreased expertise of service personnel
  - inadequate response to trouble reports and outages
  - significant disparities in service levels and availability between urban and rural areas
- Continued attention to service quality is needed because of LEC layoffs -- at least 35,000 since 1990, with 63,000 more announced by 1997

### **Service Quality Monitoring Should Be Enhanced in Two Respects**

- Geographic differences
  - 41 percent of U S West respondents and 25 percent of Pacific Bell respondents cited major disparities between urban and rural areas -- disparities that are masked by the current level of aggregation
  - The uneven development of competition likely will increase disparities between urban and rural areas

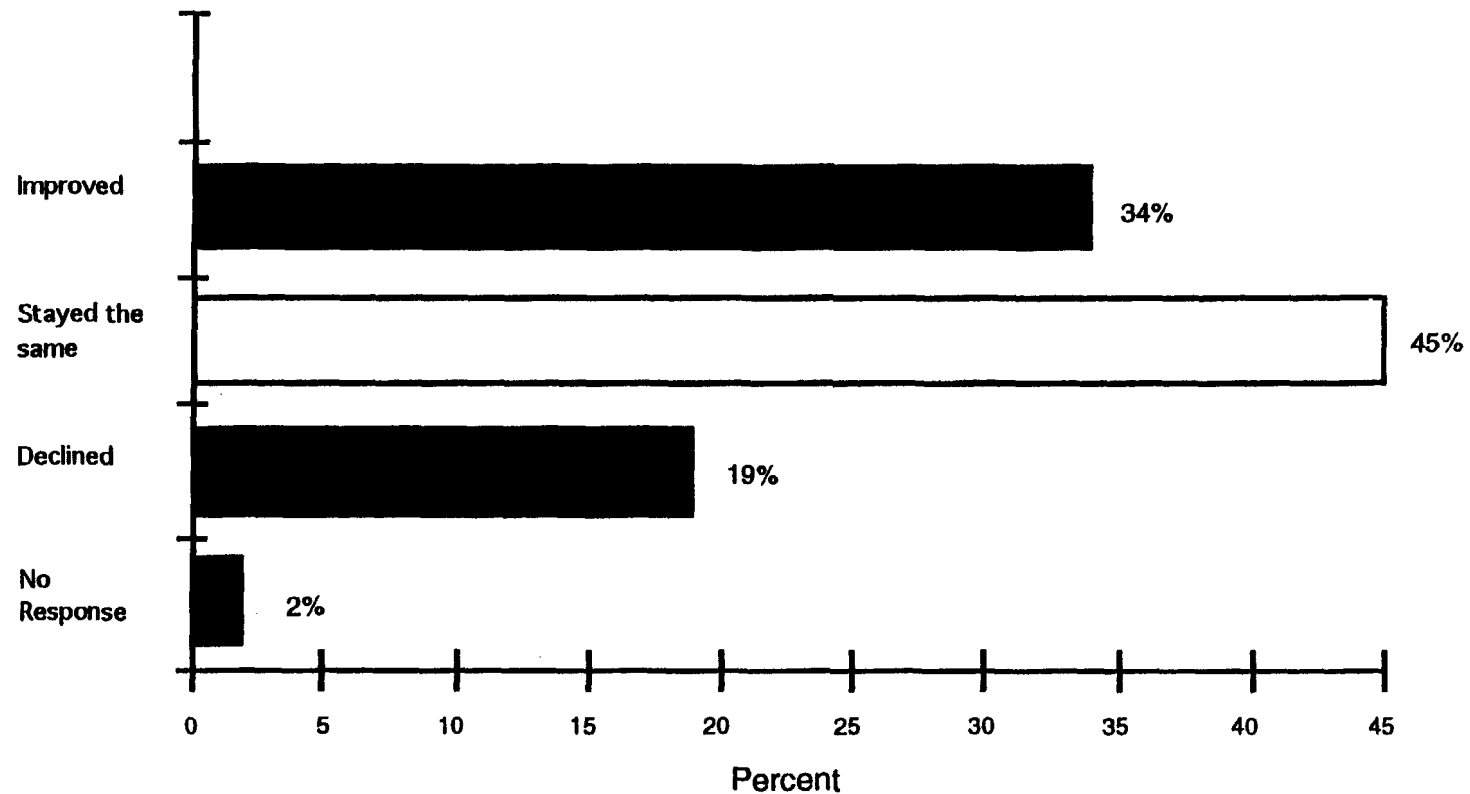
- LECs should provide exception reporting of wire centers that fall within the lowest ten percent in actual performance in any key parameter for three consecutive quarters
- LECs should report any MSA or non-MSA that is in the lowest quartile in deployment of key NII-related technologies (as supported by Pacific Bell), and if any area is listed for four consecutive quarters, the LEC should disclose its plans for deploying more modern technology.
- Data transmission quality
  - Data accounts for 14 percent of all traffic and is growing rapidly
  - High quality data transmission is important for all users -- not just big business
  - High quality data transmission is essential for many NII-related applications, including digital libraries, telemedicine, and electronic document interchange
  - Non-intrusive means exist for measuring availability, errored seconds, and severely errored seconds

### **Service Quality Monitoring Is Critical During the Transition to Competition**

- As noted above, the uneven development of competition will exacerbate existing disparities
- Competition will spur additional lay-offs and cost-cutting
- Availability of comparative information on performance enhances the benefits of competition

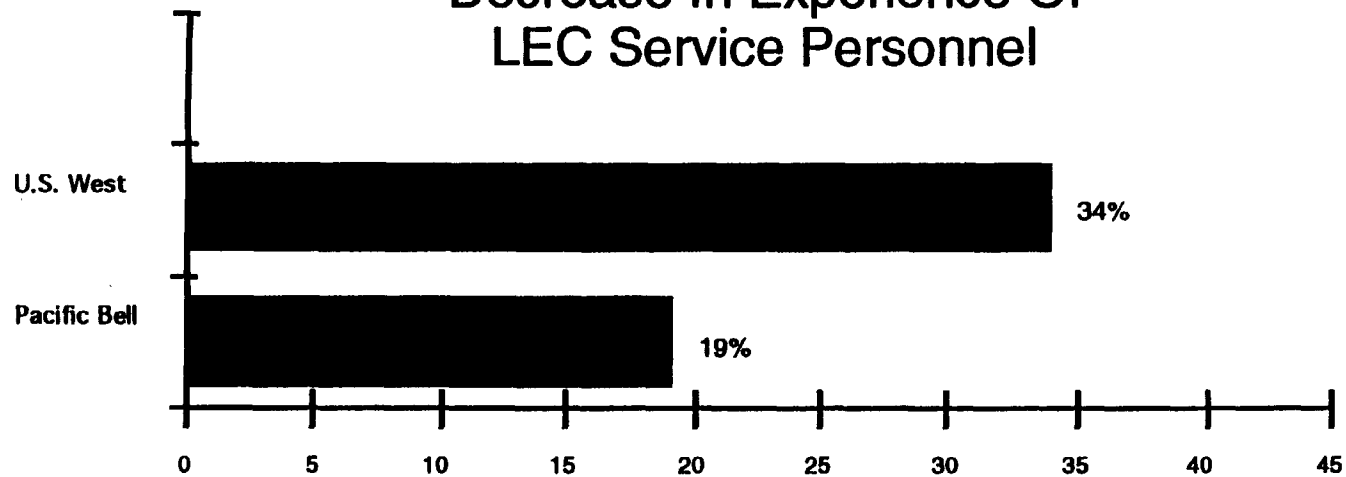
# KEY FINDINGS FROM TCA SERVICE QUALITY SURVEY (144 QUALIFIED RESPONDENTS)

Overall Service Quality (1994 vs. 1990)

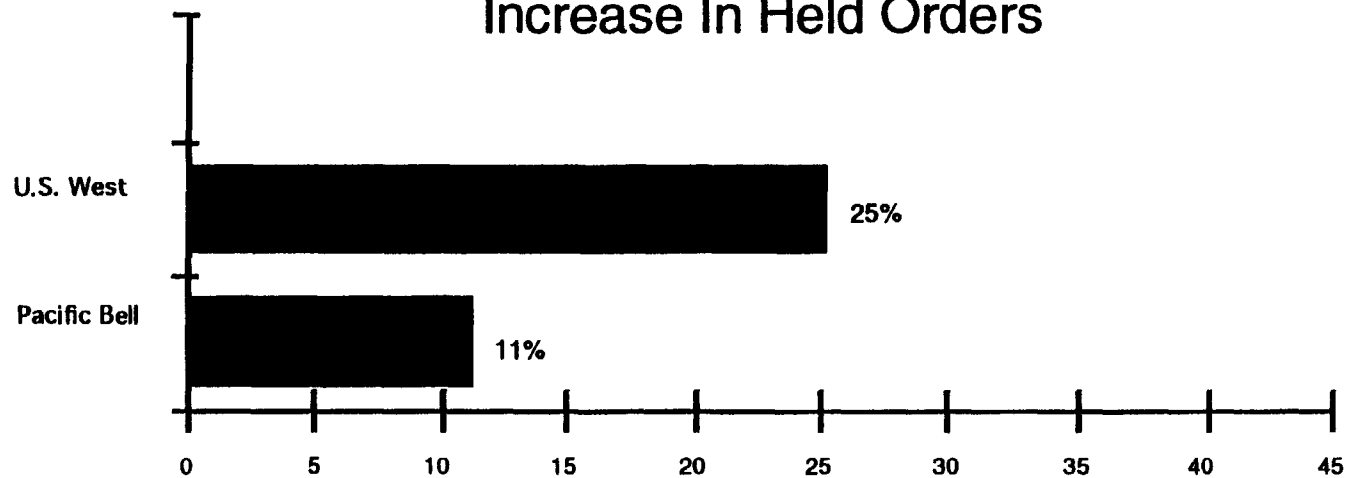


# DANGER SIGNALS

## Decrease In Experience Of LEC Service Personnel

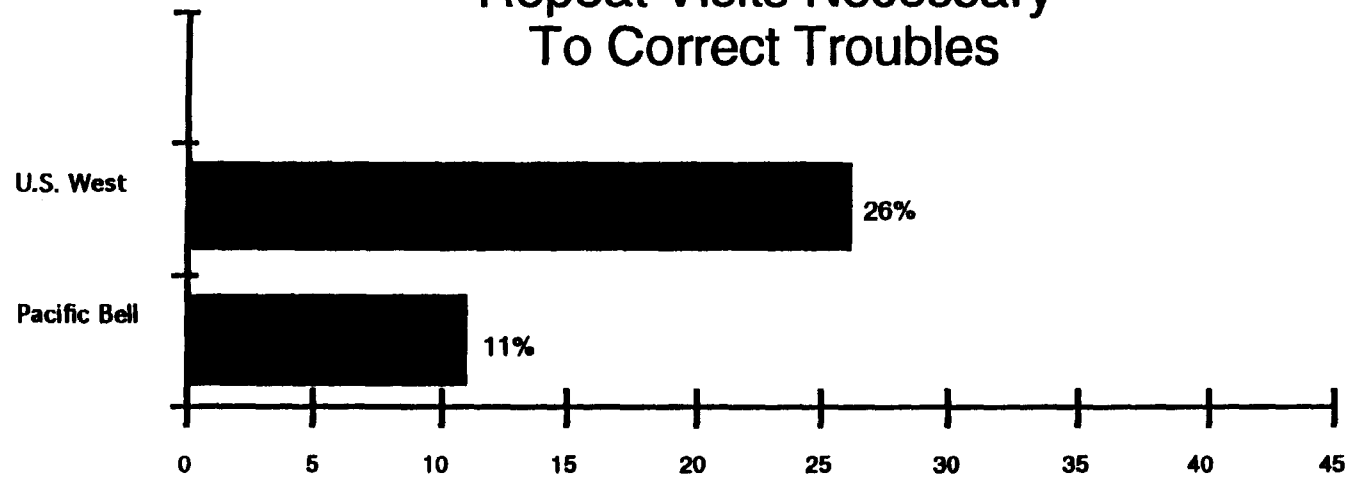


## Increase In Held Orders

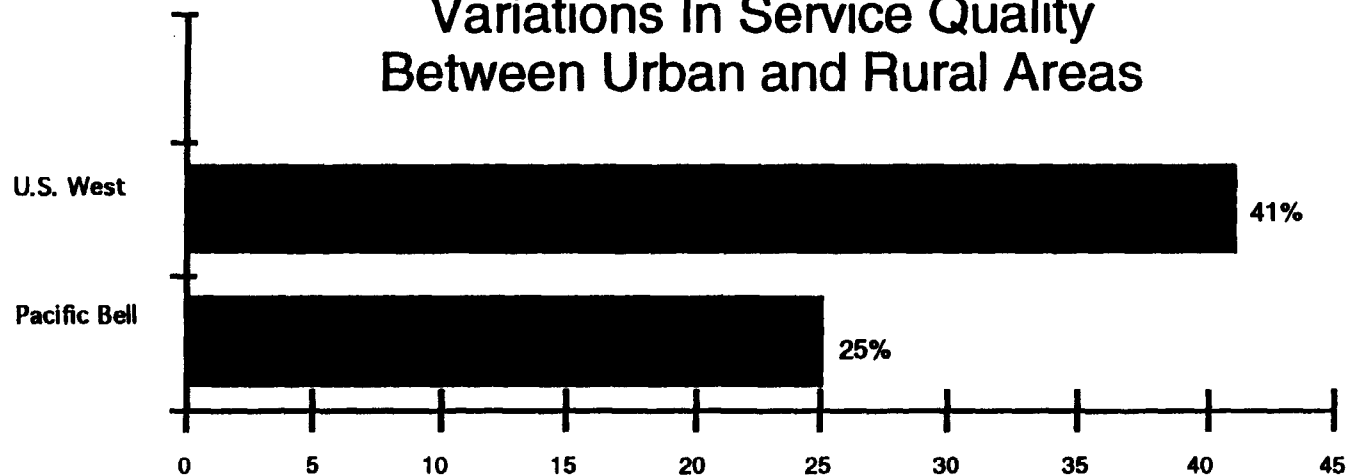


# DANGER SIGNALS

## Repeat Visits Necessary To Correct Troubles



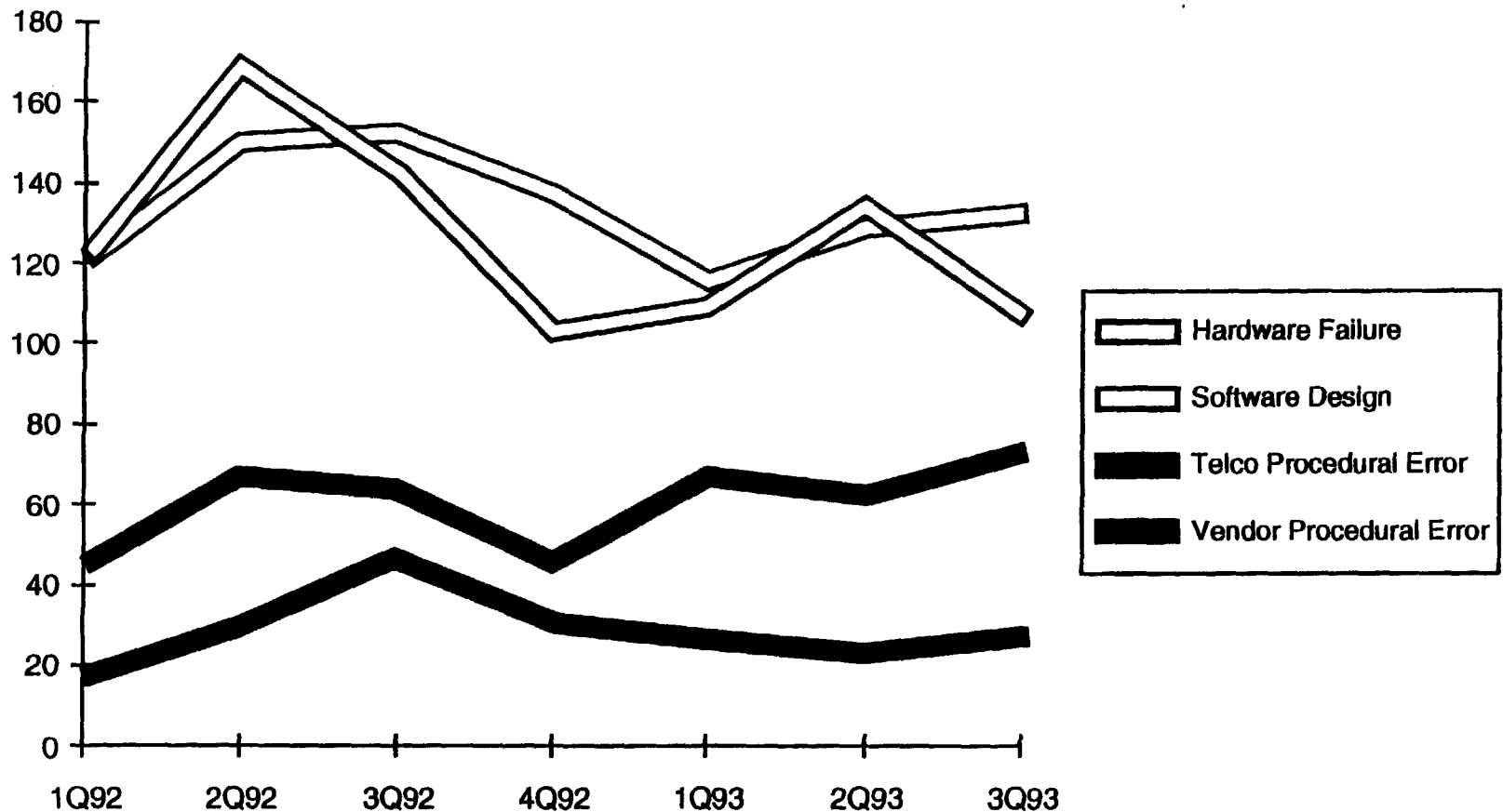
## Variations In Service Quality Between Urban and Rural Areas



## RBOC EMPLOYMENT

Carrier	Layoffs Since 1990	Planned Layoffs 1994-1997
Ameritech	4,800	10,000
Bell Atlantic	6,000	0
BellSouth	4,250	10,200
NYNEX	1,900	22,000
Pacific Bell	14,000	10,000
Southwestern Bell	3,860	1,500
U S West	0	9,000
Total:	34,810	62,700

# PREDOMINANT CAUSES OF UNSCHEDULED LOCAL SWITCH DOWNTIME





# LEC EXPERIENCE WITH LOCAL SWITCH OUTAGES

## A. Events/Million Access Lines *(Ranked from fewest to most)*

### 1st Quarter 93

Pacific Telesis (0.41)  
Bell Atlantic  
U S West  
NYNEX  
Ameritech  
SW Bell  
GTE  
BellSouth  
Contel  
United (14.47)

### 2nd Quarter 93

Bell Atlantic (0.94)  
Pacific Telesis  
NYNEX  
Ameritech  
SW Bell  
BellSouth  
U S West  
GTE  
United  
Contel (18.25)

### 3rd Quarter 93

Pacific Telesis (0.55)  
Bell Atlantic  
U S West  
Ameritech  
NYNEX  
SW Bell  
BellSouth  
GTE  
United  
Contel (25.86)

# LEC EXPERIENCE WITH LOCAL SWITCH OUTAGES

## B. Average Duration *(Ranked from shortest to longest)*

### 1st Quarter 93

Pacific Telesis  
BellSouth  
Bell Atlantic  
SW Bell  
Ameritech  
U S West  
NYNEX  
United  
GTE  
Contel

### 2nd Quarter 93

Pacific Telesis  
Bell Atlantic  
Ameritech  
BellSouth  
SW Bell  
GTE  
NYNEX  
United  
Contel  
U S West

### 3rd Quarter 93

BellSouth  
Bell Atlantic  
Ameritech  
SW Bell  
NYNEX  
GTE  
U S West  
Contel  
United  
Pacific Telesis